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August 3, 2021

VIA ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Gould v. Commissioner of Social Security,*
Civil Action No. 1:20-cv-10798-RWL

Dear Judge Lehrburger,

We write on behalf of plaintiff, Nicole Corsi Gould, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on August 10, 2021. Plaintiff respectfully requests an extension of time up to and including October 9, 2021. This is plaintiff's first request for an extension.

Subject to the approval of the Court, the parties propose the following revised briefing schedule to the Court's June 30, 2021 Scheduling Order:

- a. Plaintiff's settlement proposal was served on **July 20, 2021**;
- b. Parties shall either: (a) electronically file a stipulation dismissing, remanding, or otherwise resolving the case; or (b) electronically file a joint letter advising the Court that the parties have complied with the requirements of paragraph a and b of the June 30, 2021

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Scheduling Order but were unable to resolve the case and are proceeding to brief their respective positions by **August 20, 2021**;

- c. Plaintiff to serve her motion for judgment on the pleadings on or before **October 9, 2021**;
- d. Defendant to serve its response/cross-motion on or before **December 8, 2021**; and
- e. Plaintiff to serve her reply (if any) on or before **December 29, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn
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cc: Susan Colleen Branagan, Esq. (by ECF)

SO ORDERED:

8/3/2021

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE